

1 BROWN RUDNICK LLP
David J. Molton (SBN 262075)
2 (DMolton@brownrudnick.com)
Seven Times Square
3 New York, New York 10036
Telephone: (212) 209-4800
4 Facsimile: (212) 209-4801

5 BROWN RUDNICK LLP
Joel S. Miliband (SBN 077438)
6 (JMiliband@brownrudnick.com)
2211 Michelson Drive, Seventh Floor
7 Irvine, California 92612
Telephone: (949) 752-7100
8 Facsimile: (949) 252-1514

9 *Attorneys for Fire Victim Trustee*

10 **UNITED STATES BANKRUPTCY COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**
12 **SAN FRANCISCO DIVISION**

13 In re:

14 **PG&E CORPORATION,**

15 **- and -**

16 **PACIFIC GAS AND ELECTRIC COMPANY,**
17 **Debtors.**

- 18 ☐ Affects PG&E Corporation
19 ☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

20 ** All papers shall be filed in the Lead Case,*
21 *No. 19-30088 (DM).*

Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

FIRE VICTIM TRUST'S
NOTICE OF FINAL
RESOLUTION OF
ASSIGNED CLAIMS

[Relates to Docket Numbers 12682 and
12884]

1 TO FIRE VICTIMS AND ALL OTHER INTERESTED PARTIES:

2 PLEASE TAKE NOTICE that the PG&E Fire Victim Trust (the “**Trust**”) has settled claims
3 (the “**Assigned Claims**”) against Osmose Utilities Services, Inc. (the “**Settling Vegetation**
4 **Management Defendant**”) that the Trust held as part of the Assigned Rights and Causes of Action
5 transferred to the Trust pursuant to the *Debtors’ and Shareholder Proponents’ Joint Chapter 11*
6 *Plan of Reorganization dated June 19, 2020* [Dkt. No. 8048]. A complete copy of the settlement
7 and release agreement that was fully executed on June 21, 2024 (the “**Settlement Agreement**”) is
8 attached hereto as **Exhibit 1** and will be posted on the Fire Victim Trust Website at
9 www.firevictimtrust.com.

10 The Settlement Agreement provides, inter alia, for the Settling Vegetation Management
11 Defendant to remit to the Trust the total lump sum of four million five hundred thousand dollars
12 (\$4,500,000.00) (the “**Settlement Amount**”) and for mutual releases to be executed by the Trust
13 and the Settling Vegetation Management Defendant.

14 PLEASE TAKE FURTHER NOTICE that a redacted¹ copy of the engagement letter (the
15 “**VM Firms’ Engagement Letter**”) effective January 27, 2021, between the Trust and the firms
16 Cotchett, Pitre & McCarthy, LLP, Corey, Luzaich, de Ghetaldi & Riddle, LLP, Walkup, Melodia,
17 Kelly & Schoenberger, Dreyer, Babich, Buccola, Wood & Campora, LLP, Andrews & Thornton, A
18 Law Corporation, and Greenberg Gross LLP (together, “**VM Firms**”) in connection with the
19 Assigned Claims is attached hereto as **Exhibit 2**² and will be posted on the Fire Victim Trust
20 Website at www.firevictimtrust.com. The Trust will file a supplemental notice disclosing the
21

22 ¹ The VM Firms’ Engagement Letter remains redacted in accordance with the *Order Granting Motion of the Fire*
23 *Victim Trustee to File Redacted Versions of Certain Retention Agreements Until Litigation Related to Such Retention*
24 *Agreements is Finally Resolved* [Dkt. No. 12884], which provides, among other things, that the unredacted copy of the
25 retention agreement is confidential, shall remain under seal, and shall not be made available to anyone without the
26 express written consent of the Trustee or order of the Court until such time as the litigation to which the retention
agreement applies has been finally resolved by judgment, arbitration, mediation, or otherwise. The litigation to which
the VM Firms’ Engagement Letter applies is currently in mediation and has not yet been finally resolved with respect
to certain other vegetation management entities, including The Davey Tree Expert Co., Davey Tree Surgery Co., and
Davey Resource Group, Inc.

27 ² The Trust previously filed redacted copies of the VM Firms’ Engagement Letter as **Exhibit B** to *Fire Victim*
28 *Trustee’s Responses in Connection with the Court’s August 2, 2022 Discovery Order* [Dkt. No. 12931] and as **Exhibit 2**
to *Fire Victim Trust’s Notice of Final Resolution of Assigned Claims* [Dkt. No. 13607].

1 amounts of its costs, expenses, and attorneys' fees and disclosing the net benefit received by the
2 Trust as a result of the Settlement Agreement.

3 DATED: July 2, 2024

BROWN RUDNICK LLP

4
5 By: /s/ David J. Molton

6 David J. Molton (SBN 262075)
7 (DMolton@brownrudnick.com)
8 Seven Times Square
9 New York, New York 10036
10 Telephone: (212) 209-4800
11 Facsimile: (212) 209-4801

12 and

13 Joel S. Miliband (SBN 077438)
14 (JMiliband@brownrudnick.com)
15 2211 Michelson Drive
16 Seventh Floor
17 Irvine, California 92612
18 Telephone: (949) 752-7100
19 Facsimile: (949) 252-1514

20 *Attorneys for Fire Victim Trustee*
21
22
23
24
25
26
27
28